

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA) CR. NO. 1:18-CR-48
)
)
v.) (JUDGE WILSON)
)
CHARLES NOLDEN,) (Electronically Filed)
Defendant.)

SUPERSEDING INFORMATION

THE ACTING U.S. ATTORNEY CHARGES:

COUNT 1
Felon in Possession of a Firearm
(18 U.S.C. § 922(g))

On or about August 23, 2017, in the Middle District of Pennsylvania, the defendant,

CHARLES NOLDEN,

knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce a firearm and ammunition, that is, an Anderson AR-15 rifle, serial number 15108089, a magazine with 30 rounds and an additional 150 rounds of 5.56 caliber ammunition, that were all manufactured outside the Commonwealth of Pennsylvania, and therefore had been shipped and transported in interstate commerce.

All in violation of Title 18 United States Code Section 922(g)(1).

THE ACTING U.S. ATTORNEY FURTHER CHARGES:

COUNT 2

**Possession of a Firearm in Furtherance of Drug Trafficking
(18 U.S.C. § 924(c))**

On or about August 23, 2017, in the Middle District of Pennsylvania, the defendant,

CHARLES NOLDEN,

did knowingly and intentionally possess a firearm, that is, an Anderson AR-15 rifle, serial number 151080889, in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, that is, distribution and possession with the intent to distribute heroin.

All in violation of Title 18, United States Code, Section 924(c).

THE GOVERNMENT FURTHER CHARGES:

FORFEITURE ALLEGATION

The allegations contained in Counts 1 and 2 of this Superseding Information are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

Upon conviction of the offenses in violation of Title 18, United States Code, Section 922(g) and 924(c), set forth in Counts 1 and 2 of this Superseding Information, the defendant,

CHARLES NOLDEN,

shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States code, Section 2461(c), any firearms and ammunition involved in the commission of the offense, including but not limited to:

- a. an Anderson AR-15 rifle, serial number 15108089, including a magazine with 30 rounds of 5.56 caliber ammunition; and
- b. 150 rounds of 5.56 caliber ammunition.

If any of the property described above, as the result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).

BRUCE D. BRANDLER
ACTING UNITED STATES ATTORNEY


SCOTT R. FORD
ASSISTANT U.S. ATTORNEY

Date: 2/16/20